

EXHIBIT B

1 UNITED STATES DISTRICT COURT
2 FOR THE EASTERN DISTRICT OF VIRGINIA

3 CASE NO.: 2:18cv530

4 CSX TRANSPORTATION, INC.,
5 individually and on behalf of
6 NORFOLK & PORTSMOUTH BELT LINE
RAILROAD COMPANY,

7 Plaintiff,

8 vs.

9 NORFOLK SOUTHERN RAILWAY
10 COMPANY, et al.,

11 Defendants.
_____ /

12
13 TRANSCRIPT DESIGNATED UNDER PROTECTIVE ORDER

14 VIDEOTAPED DEPOSITION OF

15 ROBERT GIRARDOT

16 Tuesday, January 12, 2021
17 9:36 a.m. - 6:37 p.m.
Remote Proceedings

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24 Stenographically Reported By:
Gina Rodriguez, RPR, CRR, CCP
25 Job No. CS4385284

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Q. Mr. Girardot, how often do you communicate with steamship line customers?

A. Directly, you know -- you know, I mean, you know -- I'd say -- you know, I'd say I talk to a steamship line -- actually directly to a steamship line customer, you know, on average, you know, maybe once a week.

You know, but -- but indirectly, you know, in -- or together with, you know, our -- our sales team, all the time, you know, frequently.

Q. Okay.

A. You know, I'm not the direct contact.

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Did you participate in a conversation with
NPBL representatives to reach that understanding?

A. I remember being on a conference call
with -- with the NPBL representatives, and in our --

Q. And who do you remember -- I'm sorry, I
didn't mean to cut you off. But who do you remember
from the NPBL that was on that call, sir?

A. You know, I was a supporting player on the
call. I didn't really -- you know, I don't remember
who was on the other side.

1 Q. Did you introduce yourself as an attendee
2 of that call, sir?

3 A. I was on the call invite list. I know
4 that.

5 Q. Yeah. My question was: Did you introduce
6 yourself as an attendee of that call?

7 A. I'm sure I did, yes.

8 Q. Do you remember the date of the call?

9 A. No.

10 Q. Was there a calendar invitation sent for
11 that call?

12 A. I'm -- I'm sure there was, yeah.

13 Q. You mentioned in your earlier testimony
14 that there were various notes from that call.

15 Did you personally take notes?

16 A. No, I did not.

17 Q. So you don't have anything that you
18 recorded that would allow you to refresh your
19 recollection of that call?

20 A. No.

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